

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF TEXAS  
MARSHALL DIVISION**

SYMBOLGY INNOVATIONS, LLC	§	
	§	
Plaintiff,	§	Case No: 2:16-cv-00450-JRG
	§	
vs.	§	LEAD CASE
	§	
CITIBANK, NA	§	
	§	
Defendant.	§	
	§	
SYMBOLGY INNOVATIONS, LLC	§	
	§	
Plaintiff,	§	Case No: 2:16-cv-00446-JRG
	§	
vs.	§	CONSOLIDATED CASE
	§	
JPMORGAN CHASE BANK NA	§	
	§	
Defendant.	§	
	§	

**UNOPPOSED MOTION TO STAY ALL DEADLINES AND NOTICE OF SETTLEMENT**

Plaintiff Symbology Innovations, LLC (“Symbology”) hereby notifies the Court it and Defendant JPMorgan Chase Bank NA (“Chase”) have reached an agreement in principle that will resolve all pending claims between them. Accordingly, Symbology files this motion for a stay of all pending deadlines, until and including July 18, 2016, so that the parties may finalize their agreement and submit dismissal papers accordingly. This stay is not sought for the purpose of delay but so that justice may be served.

Dated: June 16, 2016

Respectfully submitted,

/s/ Jay Johnson

**JAY JOHNSON**

State Bar No. 24067322

**BRAD KIZZIA**

State Bar No. 11547550

**ANTHONY RICCIARDELLI**

State Bar No. 24070493

**KIZZIA JOHNSON PLLC**

1910 Pacific Ave., Suite 13000

Dallas, Texas 75201

(214) 451-0164

Fax: (214) 451-0165

jay@kjpllc.com

bkizzia@kjpllc.com

anthony@kjpllc.com

**ATTORNEYS FOR PLAINTIFF**

**CERTIFICATE OF CONFERENCE**

The undersigned counsel for Plaintiff Symbology certifies that he met and conferred with counsel for Defendant on June 16, 2016 and that Defendant's counsel agrees with this motion.

/s/ Jay Johnson

Jay Johnson

**CERTIFICATE OF SERVICE**

This is to certify that a true and correct copy of this document has been served on all counsel of record via electronic mail through Local Rule CV-5(a) on June 16, 2016.

/s/ Jay Johnson

Jay Johnson